

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THE LINCOLN NATIONAL LIFE §
INSURANCE COMPANY, §
Plaintiff/Counter-Defendant, §
§
v. §
§
COWBOY ATHLETICS, INC. and §
T. BOONE PICKENS, §
Defendants/Counter-Plaintiffs, §
§
v. §
§
MANAGEMENT COMPENSATION §
GROUP LEE INC., JOHN RIDINGS §
LEE, JOHN RIDINGS LEE COMPANY, §
INC., JAMES GLENN TURNER, JR., §
LARRY ANDERS, and SUMMIT §
ALLIANCE FINANCIAL, LLP, §
Third-Party Defendants. §

CAUSE NO: 3:10-CV-173-P

**THIRD-PARTY DEFENDANT JAMES GLENN TURNER, JR.'S
DESIGNATION OF EXPERT WITNESSES**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Court's January 18, 2011 Scheduling Order (as amended by the Court's October 18, 2011 Order on Agreed Motion to Extend Deadline), Third-Party Defendant James Glenn Turner, Jr. ("Turner") designates the following retained expert witnesses who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence:

1. Theodore E. Affleck
403 Cedar Street
Newington, CT 06111

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) and the accompanying report of this witness served contemporaneously with Turner's Designation of Expert Witnesses.

2. John MacBain
2753 State Road 580, Suite 101
Clearwater, FL 33761

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) and the accompanying report of this witness served contemporaneously with Turner's Designation of Expert Witnesses.

3. John E. Murray, III
5921 Still Forest Drive
Dallas, TX 75252

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) and the accompanying report of this witness served contemporaneously with Turner's Designation of Expert Witnesses.

4. Richard M. Weber
25A Crescent Drive – Suite 415
Pleasant Hill, CA 94523

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) and the accompanying report of this witness served contemporaneously with Turner's Designation of Expert Witnesses.

5. Steven K. Balman
1700 Williams Center Tower I
One West Third Street
Tulsa, OK 74103

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) and the accompanying report of this witness served contemporaneously with Turner's Designation of Expert Witnesses.

Additionally, Turner hereby designates the following as non-retained expert witnesses who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence:

1. Gregory R. Willert
9431 Haven Avenue, Suite 205
Rancho Cucamonga, CA 91730

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) served contemporaneously with Turner's Designation of Expert Witnesses.

2. Michael A. Mayberry
2929 N. Central Expressway, Suite 200
Richardson, TX 75080

The parties are directed to Turner's disclosures pursuant to Federal Rule of Civil Procedure 26(a)(2) served contemporaneously with Turner's Designation of Expert Witnesses.

3. Experts Designated by Other Parties

In addition to the foregoing experts, Turner hereby cross-designates as non-retained experts any expert designated by any other party in this case.

Discovery is not complete, all responsive documents both from parties in this action and from third-parties have yet to be produced, and Third-Party Plaintiffs have withheld numerous documents from production or otherwise redacted responsive information from documents. Turner expressly reserves all rights to provide additional reports or to supplement this designation and the reports produced contemporaneously with this designation, pursuant to the Federal Rules of Civil Procedure.

Dated: October 24, 2011

Respectfully submitted,

STACY & CONDER, LLP

/s/ Clinton D. Howie

Roy L. Stacy

State Bar No. 18988900

Clinton D. Howie

State Bar No. 00796782

901 Main Street, Suite 6220

Dallas, Texas 75202

(214) 748-5000 (Telephone)

(214) 748-1421 (Fax)

**ATTORNEYS FOR THIRD-PARTY
DEFENDANT JAMES GLENN TURNER, JR.**

CERTIFICATE OF SERVICE

On October 24, 2011, I electronically submitted the foregoing document to the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system (CM/ECF) of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by *Federal Rule of Civil Procedure 5(b)(2)*.

/s/ Clinton D. Howie

Clinton D. Howie